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June 5, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the “Finn Action”)

Dear Judge Karas:

As you know, we represent Empress Ambulance Service, LLC (“Empress”) in the above-captioned *Finn* action. Empress writes jointly with Plaintiff John Finn pursuant to the Court’s November 14, 2022 Order [ECF No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The fifteenth status report was due on Friday, June 2, 2023. We apologize to the Court for the delayed filing, today, June 5, 2023.

Since the parties’ previous status report, they have continued to finalize the settlement agreement and supporting documents for Plaintiff’s preliminary approval motion. As previously noted, the parties also have finalized a plan to avoid jurisdictional objections. The parties expect to finalize the settlement agreement and supporting documents with the help of the settlement administrator and notice expert ahead of the next status report, which is due on June 16th.

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A motion for preliminary approval is expected to be filed imminently. Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. The parties will continue to conclude work on the settlement and preliminary approval motion during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on June 16, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Casie D. Collignon". The signature is fluid and cursive, with a long, sweeping underline.

Casie D. Collignon

cc: All counsel of record (via ECF)